



**Comments by the Croton Watershed Clean Water Coalition, Inc.  
on the  
Proposed Millenium Pipeline Project**

**Department of Commerce Hearing  
November 13, 2002**

The Croton Watershed Clean Water Coalition, Inc. (CWCWC), is a not-for-profit membership organization whose objective is to maintain, protect and improve the waters of the Croton Watershed through regional action. Our Coalition represents 53 groups and over 150,000 residents throughout NYC Westchester and Putnam Counties.

We oppose the Millenium Pipeline mainly because of the damage it will cause to the Croton water supply and because, in our opinion, the real need for the pipeline has not been credibly established.

Our main concern is that the pipeline which will traverse a 2.5-mile wide stretch of the Croton Watershed, will do untold damage to water quality in the New Croton Reservoir - both during and post-construction. Among the Croton System's 10 reservoirs, the New Croton is the terminal reservoir which normally supplies close to 1 million people with high grade, unfiltered water. In times of drought such as we have recently experienced, the New Croton Reservoir becomes the drinking water supply source for over 2 million people.

According to the most recent June, 2002 DEC listing of so-called "impaired" waters that require phosphorus reduction, the New Croton Reservoir is designated as AA. In simple terms, the DEC has designated the New Croton Reservoir as a source of unfiltered drinking water - at the top of the list of high quality waters. NYCDEP states in its quarterly bulletin to its customers that Croton water fulfills all federal and state health standards. In an April 2001 flyer, DEP stated that Croton water does not need filtration.

In spite of this high designation, the New Croton Reservoir is also listed as "impaired" because of over-concentration of phosphorus. Phosphorus levels will have to be reduced by 5350 lbs/year if the Reservoir can continue to be used safely as a source of unfiltered drinking water.

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The chances of Croton water remaining unfiltered are extremely remote if the pipeline is allowed to slice its way through its watershed and pollute the reservoir to such an extent that it will require filtration. Under State law, reservoirs supplying filtered water receive less protection than those that supply unfiltered water. But beyond that, the incentive to protect the watershed will be undercut and development in the watershed will accelerate - increasing pollution to the reservoirs. As water quality declines, NYC will be forced to build a \$1.4 billion chemical treatment/filtration plant that will require \$100 million/year in maintenance costs. The City is already facing the worst fiscal crisis since the 1970s and projects a \$6 billion budget deficit next year. Tax increases and thousands of job layoffs are bound to follow.

This is not merely a City problem. The financial health of the suburbs is closely intertwined with that of the City.

Beyond financial health and even more importantly, we have to consider public health. Increased development in the watershed will result in more stormwater polluted runoff into streams and reservoirs from roads, housing, shopping malls, commercial enterprises and parking lots. A short list of the contents of typical runoff includes particulates from pavement wear and vehicles; nitrogen and phosphorus from roadside fertilizer application; lead from tire wear and automobile exhaust; zinc from tire wear, motor oil and grease; copper from brake lining wear, moving engine parts, fungicides and insecticides; cadmium from tire wear, roadside insecticide application; chromium from moving engine parts, brake line wearing; nickel diesel fuel and gasoline, lubricating oil, brake lining wear; manganese from moving engine parts; cyanide from anticake compound used to keep deicing salt granular; sodium, calcium and chloride in deicing salts; and petroleum. A 2001 study by the USGS has found a link between urban sprawl and carcinogens in water. The study shows a positive correlation between increase in vehicular traffic associated with urban sprawl and the increase in polycyclic aromatic hydrocarbons (PAHs) found in aquatic sediments. PAHs are classified as bioaccumulative carcinogens.

Even installing the proposed pipeline in the watershed will have severe environmental consequences.

- Anywhere from 25,000 to 30,000 trees from Croton to Millwood will have to be cut down and their stumps removed. Loss of trees will degrade air quality which is already severely below standard in Westchester County. Trees help to hold soils in place during major storms. Heavy flows of sediment into streams and reservoirs can be expected. In the Teatown Lake Nature Preserve alone, the estimate is for 14,400 trees to be destroyed and a 75-foot swath of denuded landscape created. The pipeline will cut right through the 33-acre Teatown Lake. The 700-acre Teatown Lake Reservation which includes the Preserve drains in large part to Bailey Brook which flows directly into the New Croton Reservoir.

- 20 to 25 acres of vegetation along the pipeline will be removed. Their ability to hold soil in place will be forfeited as well as their ability to filter out pollutants.
- The pipeline will cut through wetlands, streams, rivers and ponds. This will require blasting through rock. It will require further destruction of the natural landscape along the right-of-way so as to create level areas as workspace for the machinery involved. The cleared construction swath along the pipeline will be from 75 feet to 100 feet.

Residents of Westchester County are trying their utmost to preserve the features of this County which made it so attractive to them and provided them with a home. Ten Westchester municipalities have voted to raise their taxes in order to preserve open space. Residents turn out in overwhelming numbers to oppose development that would destroy the character of their community. The Millenium Pipeline is just such a development.

Sensing public opinion, even the regulatory agencies are beginning to try and protect the watershed. Just recently, both Governor Pataki and the NY District of the Army Corps of Engineers designated the entire East of Hudson Watershed as Critical Resource Waters. This designation provides a new level of protection for the watershed by withdrawing many of the Nationwide Permits which facilitated development. The new Phase II Stormwater Regulations are likely to be adopted for the whole EOH in the very near future. Again, any development will have to be conducted with much more care and at far greater expense.

The price to be paid for this pipeline in terms of disruption of the lives of residents living in its proximity, in terms of economic costs, in terms of adverse environmental impacts to large areas of Westchester County, and in terms of pollution to our most vital resource, namely, our drinking water, are far too great. Whatever benefits the pipeline might or might not bring to us are simply not worth these costs.

Therefore, the Croton Watershed Clean Water Coalition is opposing the Millenium Pipeline.

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